

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,

Debtors.

)
) Chapter 11
)
) Case No. 23-00623 (TJC)
)
) (Jointly Administered)
)
) **Objections Due: November 8, 2024 at 4:00 p.m.**
Hearing Date: *Only if objections are filed*

**AMENDED NOTICE OF MOTION OF SILLS CUMMIS & GROSS PC
TO ENFORCE THE CONFIRMATION ORDER, PLAN AND LIQUIDATION TRUST
AGREEMENT AND TO COMPEL THE LIQUIDATION TRUSTEE TO PAY POST-
PETITION FEES AND EXPENSES**

PLEASE TAKE NOTICE that on the 18th day of October 2024, Sills Cummis & Gross P.C. (“Sills”) filed the *Motion of Sills Cummis & Gross PC to Enforce the Confirmation Order, Plan and Liquidation Trust Agreement and to Compel the Liquidation Trustee to Pay Post-Petition Fees and Expenses* (the “Motion”) with the United States Bankruptcy Court for the Northern District of Iowa (the “Court”).

PLEASE TAKE FURTHER NOTICE that objections or responses, if any, to the Motion must be (i) filed with the Clerk of the Court, 111 7th Avenue SE, Box 15, Cedar Rapids, Iowa 52401, **on or before November 8, 2024 at 4:00 p.m. (ET)** (the “Objection Deadline”), and (ii) served no later than the Objection Deadline on the undersigned counsel for Sills with a copy to the attorneys for the United States Trustee.

PLEASE TAKE FURTHER NOTICE that, if an objection is properly filed and served in accordance with the above procedures, a hearing (the “Hearing”) on the Motion will be held at a time and date to be determined before the Honorable Thad J. Collins, United States Bankruptcy Judge, United States Bankruptcy Court for the Northern District of Iowa, 111 7th Ave. SE, Cedar Rapids, IA 52401. Only objections made in writing and timely filed and received will be considered by the Court at such Hearing.

PLEASE TAKE FURTHER NOTICE that if no objection is filed, the appropriate order will be entered.

Dated: October 21, 2024

Respectfully submitted,

SILLS CUMMIS & GROSS, P.C.

/s/ Andrew H. Sherman

Andrew H. Sherman, NJS Bar No. 042731991

(admitted *pro hac vice*)

Boris I. Mankovetskiy, NJS Bar No. 012862001

(admitted *pro hac vice*)

One Riverfront Plaza

Newark, New Jersey 07102

Telephone: 973-643-7000

Facsimile: 973-643-6500

E-mail: asherman@sillscummis.com

bmarkovetskiy@sillscummis.com

/s/ Robert C. Gainer

Robert C. Gainer AT0000305

CUTLER LAW FIRM, P.C.

1307 50th Street

West Des Moines, IA 50266

Tel: 515-223-6600

Fax: 515-223-6787

Email: rgainer@cutlerfirm.com

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served electronically on parties who receive electronic notice through CM/ECF as listed on CM/ECF's notice of electronic filing dated October 21, 2024.

/s/ Stephanie Newton